

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

A.O.A., *et al.*,

Case No. 4:11-cv-44-CDP  
(CONSOLIDATED)

Plaintiffs,

v.

THE DOE RUN RESOURCES  
CORPORATION, *et al.*,

Defendants.

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**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Defendants The Doe Run Resources Corporation and The Renco Group Inc. (“the Companies”) move for enlargement of time to reply to Plaintiffs’ response in Opposition to the Companies’ Motion for Sanctions and Remedial Measures and Cross-Motion for Sanctions (“the Response”) filed in this action on August 18, 2023 (ECF 1367).

1. On August 4, 2023, the Companies filed a sealed memorandum in support of a Motion for Sanctions and Remedial Measures and associated exhibits in this matter (“*Reid*”) (ECF 1362), and in *J.Y.C.C., et al v. Doe Run Resources, Corp., et al*, Case. No. 4:15-cv-01704-RWS, (“Collins”) (ECF 761).
2. *Reid* plaintiffs filed the Response on August 18, 2023. ECF 1367.
3. The Companies’ Reply to plaintiffs’ Response is due on August 28, 2023; a response to the cross motion would be due September 1, 2023.

4. *Collins* plaintiffs filed (with the Companies' agreement) a motion seeking extension to file their response to the motion for sanctions and remedial measures until August 25, 2023, and to set the Companies' reply for September 6, 2023. *Collins* ECF 768.

5. The Companies request a short enlargement of time to reconcile briefing in both *Collins* and *Reid* on the same topics, to reconcile the replies, to create a more efficient framework for drafting, and to obtain a small enlargement of the time to brief the complex issues raised in the *Reid* response and cross motion and expected in the *Collins* response.

6. The Companies counsel conferred with *Reid* counsel who do not oppose the relief sought here.

7. The Companies counsel conferred with *Collins* counsel who do not oppose the relief sought here.

8. The requested extension is reasonable in these circumstances, is not sought for the purpose of delay, will not prejudice any party and will serve judicial efficiency.

WHEREFORE, the Companies respectfully request the Court enter an order granting an  
enlargement of time to reply to the Response up to and including September 6th, 2023.

Dated: August 22, 2023

Respectfully submitted,

**RIVERO MESTRE LLP**

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Renco Group, Inc.*

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**CERTIFICATE OF SERVICE**

I certify that on August 22, 2023, I electronically filed this document with the Clerk of the Court using CM/ECF. I also certify that this document is being served today on all counsel of record by transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Andrés Rivero  
ANDRES RIVERO